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14 **UNITED STATES BANKRUPTCY COURT**

15 **DISTRICT OF NEVADA**

16 In re

17 CASH CLOUD, INC.,
18 dba COIN CLOUD,

19 Debtor.

20 Case No. BK-23-10423-mkn
21 Chapter 11

22 **REPLY TO RESPONSE TO DEBTOR'S
23 MOTION TO COMPEL TURNOVER OF
24 ESTATE ASSETS**

25 Hearing Date: June 28, 2023
26 Hearing Time: 10:30 a.m.

27 Cash Cloud, Inc. d/b/a Coin Cloud ("Cash Cloud," or "Debtor"), debtor and debtor-in-
28 possession in the above-captioned Chapter 11 case (the "Chapter 11 Case"), by and through its
undersigned counsel, Fox Rothschild LLP, hereby files this *Reply To Response To Debtor's Motion
to Compel Turnover of Estate Assets* (the "Reply").¹

29 Dated this 26th day of June, 2023.

30 **FOX ROTHSCHILD LLP**

31 By: /s/Jeanette E. McPherson

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39 ¹ Capitalized terms not defined herein shall have the meanings ascribed to them in the Motion.

POINTS AND AUTHORITIES

2 In the *Response To Debtor's Motion to Compel Turnover of Estate Assets ("Response")* Mr.
3 McAlary states that there are no DCMs in Brazil and asserts that the following statement in the Motion
4 is incorrect: "As of December 31, 2022 the Company operated approximately 4800 DCMs throughout
5 the United States and Brazil, installed in some of the largest convenience, grocery and liquor store
6 chains and prestigious malls." See Response at pp. 1-2 [ECF 752]. Mr. McAlary's Response is
7 perplexing in that Mr. McAlary has made this statement under oath in numerous declarations that he
8 executed and were filed in this case. *See e.g.* ECF 19, 104, 356, 359, 362, 365, 535. Nonetheless,
9 the Deposits referenced in the Motion do not pertain to DCMs located in Brazil. Consequently, the
10 concerns raised in the Response are not relevant.

CONCLUSION

Based upon the foregoing, the Debtor respectfully requests that the Motion be granted and that the Court grant such other and further relief as may be just and proper.

14 Dated this 26th day of June, 2023.

FOX ROTHSCHILD LLP

By: /s/Jeanette E. McPherson

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